

**DEx. 27**

**Lodged Under Seal**

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DONALD J. TRUMP  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10 TARLA MAKAEFF, BRANDON )  
KELLER, ED OBERKROM, SONNY )  
11 LOW, J.R. EVERETT and JOHN )  
BROWN, on Behalf of Themselves and )  
12 All Others Similarly Situated, )

Case No. 10 CV 0940 CAB (WVG)

13 Plaintiffs, )

DECLARATION OF TROY  
PETERSON

14 v. )

15 TRUMP UNIVERSITY, LLC, (aka )  
Trump Entrepreneur Initiative, LLC, a )  
16 New York Limited Liability Company, )  
DONALD J. TRUMP, and DOES 2 )  
17 through 50, inclusive, )

DATE: February 12, 2013  
TIME: 2:30 p.m.  
CTRM: 2 — 4<sup>th</sup> Floor

18 Defendants. )  
19

20 I, Troy Peterson, declare:

21 1. I was a mentor for Trump University. I make this declaration of my own personal  
22 knowledge.

23 2. I have been involved in real estate for over 20 years, including 10 years as a real  
24 estate agent working for Coldwell Banker and other similar companies. I have also been a broker  
25 managing my own offices. In 2001, I started a company called Homeyeah.com, which was one of  
26 the first Internet based real estate companies. I also manage properties for HUD on a multi-state  
27 level, working for one of their management marketing companies called Golden Feather Realty, one  
28 of the first management marketing companies that took back contracts when HUD privatized in the

1 1990s. In 2002, I became actively involved in investing in real estate and started buying and selling  
2 properties, fixing up and rehabbing properties and working with income properties, mostly  
3 residential.

4 3. I have been involved in thousands of real estate transactions totaling more than \$50  
5 million. Those transactions include rental deals, commercial deals, hotel casino transfers in Nevada,  
6 water rights and farmland transfers in the deserts of California, residential subdivisions and  
7 development projects, single-family homes, apartment building transfers, buy, fix-up and resale of  
8 flip-type properties, wholesale strategies, which is buying and selling a property before you own it  
9 (i.e., selling your rights on the contract), and short sales.

10 4. I became involved with Trump University in the Summer of 2008. I attended  
11 segments of Trump University's three-day program and am very familiar with the techniques that  
12 were taught in the Trump University classroom. For example, I know Trump University taught  
13 about foreclosure properties, cash flow, flipping, wholesaling, lease options, and other strategies.

14 5. I have personal experience with the techniques taught by Trump University and  
15 worked with other Trump University mentors and instructors. The programs were tailored to  
16 location, market conditions, feedback, and evolved over time. I personally know and spoke with  
17 other Trump University instructors and mentors and worked with them. For example, a Trump  
18 University team taught a program in Maryland. Before the program began, I was aware that  
19 Maryland has some unique laws concerning foreclosure and pre-foreclosure. The Wall Street office  
20 called me and we discussed the specific issues unique to Maryland that would be taught and sent the  
21 team some special Maryland addenda to ensure that they were familiar with the laws. To my  
22 knowledge, The team then taught the course according to the laws in the state of Maryland.

23 6. Over the course of a couple of years, I would estimate that I mentored between 45  
24 and 60 Trump University students.

25 7. The mentorships involved teaching many different strategies to students and each was  
26 unique. Some people worked a full-time job, so they had only a few hours a week to dedicate to real  
27 estate. Others had decided to go full bore and had nothing else to do, so they had more time. We  
28 prepared customized plans and strategies to fit their individual schedules and goals. The students

1 also had different ideas of what they wanted to do or accomplish. I always considered their goals  
2 and time, and then we would build a strategy. With some students, we mixed and matched  
3 strategies. For example, some students wanted to buy and fix and flip a property and then start  
4 holding. Others wanted to purchase and hold properties. I mentored one student who already had  
5 purchased a 12-unit apartment complex before we started the mentorship. He wanted help to  
6 increase his income on his apartment building to make it more profitable, so we spent the better part  
7 of the mentorship on this particular objective.

8 8. I always gave a lot of homework to people prior to meeting them in the field. I  
9 instructed them on what types of properties they were looking for. I taught them to establish  
10 contacts with real estate agents. I instructed them to talk to various hard money lenders. I instructed  
11 them create a database of lenders and investors. I asked my students to screen properties, and I  
12 taught them how to run the analysis on the properties that would match whatever strategy they were  
13 looking for, whether it was short-term strategy or a long-term income producing strategy. We also  
14 discussed the analysis together. Once they were comfortable with the approach, we would prepare  
15 for the in-field work. Some people were ready in two weeks, others took several months. Then, I  
16 would schedule to meet them for their in-field work.

17 9. I have mentored Trump University students from coast to coast. I have mentored  
18 Trump University students in the boroughs of New York City, North Jersey, downtown Baltimore,  
19 the suburbs of St. Louis and Northern and Southern California. I have also mentored students in  
20 Texas, Georgia, and my home state of Florida.

21 10. To prepare for out-of-state, in-field mentorships, I prepared in a variety of ways. I  
22 collected market data about the city. I identified trends using sites like Trulia. Also, Boards of  
23 Realtors post market statistics. This allowed me to identify strategies I might recommend. For  
24 example, a student interested in flipping properties in Buffalo, New York, might do best with a buy-  
25 and-hold strategy to match the market. I tried to steer the student into strategies that fit their  
26 business model, goals and market.

27 11. Typically, the mentorship included six telephone calls of about an hour. Trump  
28 University suggested that students use three of the calls before going into the field and three support

1 calls afterwards. A lot of people took all six calls before they were ready for the in-field work, to  
2 make sure their questions were answered and to increase their comfort level to a place where I knew  
3 their field time would be productive. I never held students to only six sessions. I kept it open-ended,  
4 and was available to talk until they were ready, and after the in-field work, I was always available  
5 for more help. Once we got into the field, we did a lot of hands-on work. Typically, we met at 9:00  
6 a.m. on the first day, which involved computer work and sometimes we would go into the field.  
7 Usually, we got a list of properties that the student had obtained from their realtor or from their  
8 prospecting or marketing efforts and we would screen the properties together. I would take them  
9 through some exercises, we made phone calls together to sellers, real estate agents and potential  
10 investors. The goal was to identify the best prospects and locate possible funding resources.

11 12. I did not provide the student with a list of properties. I was not there to do the work  
12 for them. The whole point was to teach them how to do it. If you hand the student a list of  
13 properties, it is basically the same as “giving them a fish.” You have to “teach them to fish,” not  
14 “give them a fish.”

15 13. If the student did not have a list of properties as I requested — and most did not — I  
16 taught them how to locate properties and then we worked through the list together. We then drove  
17 various neighborhoods and looked at different types of properties. We looked at different indicators  
18 while out in the street, the condition of the properties and other factors to gauge whether the area  
19 was suitable and decide what strategy would work best in that neighborhood. Sometimes we met  
20 with realtors or sellers on the first day and looked at properties. The second day was often spent  
21 exclusively looking at properties. Based on what properties qualified during the first day, we  
22 scheduled appointments to meet with real estate agents and sellers, and ran numbers on some deals.  
23 We often estimated the repair costs on properties, and I taught students how to gauge the repairs to  
24 match the strategy they were using, whether it was a short-term or a long-term deal. Then we sat  
25 down and ran more numbers to see whether the transaction made sense and was right for the student.  
26 Many times, the third day ended up being a “calculator day.” Doing research, running numbers,  
27 meeting with the realtors to structure offers, making sure that we had the right wording in the  
28

1 contracts to keep them protected should something go wrong. The third day often involved  
2 structuring and making offers on property.

3 14. My personal goal was to get students to submit at least one offer before I left their  
4 presence. I wanted to be there with them when they wrote the offer. I made many offers with  
5 students I mentored and some of those offers were accepted. However, some did not have the  
6 resources or just were not prepared to make offers.

7 15. Several of my students made money. A couple of examples include: Cheryl Collins  
8 from Warwick, Long Island. She flipped a few properties and made about \$30,000. I worked with  
9 her in the field for several days in her neighborhood, including meeting with the  
10 realtor/lender/investor team we put together. Another was Charles Lee in North New Jersey. He  
11 purchased a property that we looked at together in Passaic. It was single-family home in a blue  
12 collar neighborhood. We spoke many times even after the mentorship. In fact, he had some  
13 problems with the transaction, and I helped him go back and re-negotiate with the bank to get the  
14 price reduced. He wound up getting the property at a considerable discount. He also bought a  
15 second property that we had looked at together. He rehabbed it, and put it back on the market.

16 16. Different students had different resources. Some did not have money to work with,  
17 while others had millions in cash. I tried to structure plans to fit each student's needs, goals and  
18 resources.

19 17. After each in-field mentorship, I continued to be available and involved with my  
20 students. I left the door open for them. Some people continued to call me, in fact I still get emails  
21 from former students with questions or updates on their real estate business. Others, I never heard  
22 from again.

23 18. The mentorships were all informational, educational, experiential, and training.  
24 There was absolutely no selling at all ever. I never attempted to sell students I mentored anything at  
25 any time.

26 19. Trump University requested that students fill out evaluations. I was asked to submit  
27 evaluations with the final paperwork to get paid. I asked each student to fill them out and to be  
28 honest. I asked them to let me know if they were not happy with something, but also, I told them

1 that they were welcome to let only Trump University know if they had an issue. I never asked  
2 anyone to give me specific numbers or scoring. I never attempted to influence evaluations. The  
3 general feedback I got from my students was always very positive.


4 20. My interaction with Tarla Makaeff began in 2009 after Trump University called to let  
5 me know that she needed some additional coaching. They said she was struggling with some of the  
6 numbers and asked that I help her with six to twelve sessions. Ms. Makaeff and I scheduled a couple  
7 of sessions, and I explained numerous concepts and ran numbers with her. I recall that she had  
8 difficulty focusing on a particular strategy. She was not good at keeping our scheduled coaching  
9 sessions. She often had things come up, and she would not take the call at the appointed time. Then  
10 she would call a few days later with something that she needed immediate help on. This business  
11 requires students to follow certain steps and procedures, She did not follow the steps or process, and  
12 I told her so. She then stopped returning my calls. I did meet her at a Trump University event in  
13 Marina del Rey. She got particularly mad at me when I told her my concern. I always felt that as a  
14 mentor and a trainer, it is my duty to tell people the truth. One of the things I told her was that she  
15 really needed to make it a priority to spend time with her coach and to quit cancelling and pushing  
16 appointments off.

17 21. Trump University asked me to mentor Joann Everett and her husband or partner.  
18 They were nice people. Initially, they had been assigned to somebody else as a mentor but  
19 apparently never completed it. Trump University called me to let me know I would be their new  
20 mentor. Ms. Everett and I spoke for about a year. She and her husband live in Tampa, which is  
21 practically my back yard, so I was excited about doing the mentorship so close to my home in  
22 Orlando. Tampa is only an hour and half away from Orlando. I am very familiar with both markets.  
23 There is only one MLS for Orlando and Tampa. She was a broker and was looking for ways to re-  
24 start her business. She did some of the initial homework but then not much. I made several  
25 suggestions to her such as placing ads on Craig's List to reach out to realtors for certain types of  
26 properties. I suggested that she activate her license with the MLS under the Thompson Broker Rule  
27 so she did not have to pay the Board membership fees, which was a concern of hers. I also put her in  
28 contact with an attorney in Boca Raton, who handled loan modifications. She or her husband had

1 been a mortgage broker before the market all turned, and they had a large database of people who  
2 were in trouble with their mortgage. So, we saw that as a potential for her to develop an income  
3 stream. She told me she needed to make some money, and through my contact, she did a couple of  
4 modifications and earned commissions. They tried to pay me a fee, but I felt that was a conflict of  
5 interest to take payment from them when I was supposed to be training her. I sent that money back  
6 to the attorney and told them to pay her directly. It was something that I did as a mentor to help get  
7 her some income based on her desired goals and available resources.

8         22. After Ms. Everett rescheduled and postponed her mentorship for many months,  
9 Ms. Everett and I finally scheduled the in-field portion of her mentorship for February 2011. The  
10 closer we got to the date, the more nervous she became. Ultimately, she cancelled it. I received a  
11 call from Trump University letting me know that she did not want to do her mentorship any more. I  
12 called Ms. Everett her and she assured me that it had nothing to do with me but that they just did not  
13 want to do their mentorship.

14         I declare under penalty of perjury under the laws of the United States that the foregoing is  
15 true and correct and that this declaration was executed by me on \_\_\_\_\_, 2012, at  
16 Orlando, Florida.

17   
18 Troy Peterson

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1 notes (creating, buying and brokering) and hard money lending. There are not many things in the  
2 real estate investment world that I have not done or been involved with over the years. I would  
3 estimate that I have handled over 150 real estate transactions.

4 3. I began as a Trump University instructor in approximately 2008. The Trump  
5 University mentorship program consisted of several parts. First, prior to going out into the field with  
6 the student, I spent considerable time on the phone with students for two, three, or four weeks,  
7 learning about their background, experience, real estate intentions, resources, goals and discussing  
8 different strategies that may be appropriate for their individual goals. I also helped them get up to  
9 speed on real estate investing. I gave them homework to do in preparation for the in-field work and  
10 some legwork to accomplish before I arrived in their market. Next, I spent three days with each  
11 student in the field, one-on-one, helping them to get their business started or take it to another level,  
12 if they already were an investor. Each mentorship was tailored and unique and depended in large  
13 part on each student's "starting position," desires, goals and abilities. Third, I was available for the  
14 remainder of the 12-month period by telephone, email and fax to help coach them through deals and  
15 answer any questions as they came up. Some students called to ask questions or for advice or help,  
16 and others did not.

17 4. I mentored between 30 and 50 students over about a two year period, and at any given  
18 time I mentored between six to ten students.

19 5. The mentorships were not just in my home state of Texas. I flew to many cities and  
20 mentored students in the New England area, Florida, California and Washington. Before going into  
21 any market with a student, I learned about the market by talking to other mentors who had worked  
22 those areas to get a better understanding of the market. I also contacted realtors and investors in the  
23 area, to get up to speed on the market. I also had the student do some legwork to gather information  
24 to help them understand the market.

25 6. It was important for the student to do some of the legwork. It was my job to teach  
26 them how to work in that market, but they also needed to be knowledgeable about the market and  
27 have a good working knowledge of what was going on there since this is where they would conduct  
28 their business.

1           7.       Each mentorship was different and based on many factors, including personality  
2 types, goals, resources, time constraints, and work ethic. Some people wanted to get wealthy, some  
3 simply wanted to add a little extra income. Some were able to work in real estate as a full-time  
4 business, some could work in real estate only part-time, so it depended on the situation of each  
5 student. Some wanted to own rentals, some wanted to buy properties and hold them, some wanted to  
6 buy, fix them up and resell them. Some were interested in doing wholesale deals. Some wanted to  
7 assign contracts on properties. Each mentorship depended on what the student wanted to do. On a  
8 few occasions, students wanted a mentorship out of my area of expertise. For example, one student  
9 expressed an interest in commercial properties. Since that was not one of my strong suits, I  
10 recommended that student to another Trump University mentor who had a stronger background,  
11 more experience, and was more knowledgeable in commercial properties.

12           8.       Although each mentorship was different, the structure had some similarities. My  
13 usual approach to a mentorship was to have three to five telephone sessions with each student before  
14 the one-on-one in-field work. Typically, the phone conversations would last 30 minutes to an hour.  
15 We discussed the student's goals, intentions, interests, resources, level of commitment and related  
16 background, experience and personal issues. We also discussed real estate strategies and options and  
17 tried to select areas that fit each student's goals and abilities. For example, if a student was  
18 interested in wholesaling, I would train them about strategies, techniques and approaches specific to  
19 wholesaling. If a student was interested in rentals, then we discussed different aspects of buying  
20 properties at a deep enough discount to make sure they would have cash flow and how to calculate  
21 cash flow. We did a lot of the initial work over the phone so that when I met with the student on-  
22 site, we went in the field, start looking for properties that had potential, and did everything we could  
23 to get offers in place while we were working in the field together.

24           9.       The field work varied, depending on the student's goals. Sometimes, it consisted of  
25 working with realtors on site to show us listings that might have possibilities. We drove through  
26 many neighborhoods to get familiar with the types of properties that the student wanted to own. It  
27 was important to teach practical tips how to make contacts and get contact information depending on  
28 the type of investment strategy each wanted. Some students were more comfortable than others

1 initiating these contacts. Those who already had those skill sets did not need much help in that area,  
2 others needed more “hand-holding.” On some occasions, we visited title companies, to get the  
3 student familiar with working with title companies. I had some students contact traditional lenders,  
4 hard money lenders and mortgage brokers, to become familiar with financing options. Again, some  
5 students knew how to do some of these things, and others did not. Each mentorship was tailored to  
6 the needs, skill set and abilities of each student.

7 10. Often during the mentorships, the student, with my assistance, would make offers on  
8 properties. Some offers were accepted, and some were not.

9 11. Several of my students made money in real estate utilizing Trump University  
10 techniques, and information and methods we discussed during the mentorship. For example, a  
11 student named Jason Sanders in San Francisco was interested in buying, rehabbing and reselling  
12 properties. He also had some interest in wholesaling properties and contracts. Jason was very  
13 attentive, aggressive and willing to learn. He made money using Trump University’s techniques.  
14 Jason is still in the real estate business, doing very well, and very happy with it. It has been three or  
15 four years since I finished my field work with Jason, but I still keep in touch with him. He calls me  
16 from time to time when he has an issue to discuss or questions, and I still provide guidance and  
17 advice for him, free of charge. I had another student in the Carmel area of California who I worked  
18 with to buy many properties. The biggest challenge with him was teaching him to leverage his  
19 money. I think we got four offers in place, and two of those offers were accepted. He remodeled the  
20 properties, got them resold and made reasonable profits on those properties of between \$15,000 and  
21 \$40,000 per property.

22 12. I tried to make each of my mentorships a real-world experience by covering a lot of  
23 information, including a lot of training, and the experience of working on actual deals. I never sold  
24 anything additional to my students, nor did I attempt to do so.

25 13. After each mentorship, students were asked to fill out evaluations. I provided each  
26 student with the evaluation form after we had completed the mentorship and asked them to please fill  
27 it out. I also gave them an envelope and asked them to put it in the envelope, seal it and mail it to  
28 Trump University’s office in New York. My preference was to get the postage on the envelope and

1 ride with them to the post office to make sure it got mailed to Trump University. However, I did not  
2 watch them fill out the evaluation nor sit with them while they were filling it out. I never suggested  
3 how anyone should complete their evaluation.

4 14. Trump University compensated me only after each in-field mentorship was  
5 completed. Trump University followed up with the students to make sure that they were satisfied. If  
6 a student was not satisfied, I was asked to go back to the student to see what else they wanted or  
7 needed. Once the student was satisfied, then I was paid. There were very few instances where  
8 students were not satisfied with their mentorship with me.

9 15. I attended a Trump University three-day seminar in Ft. Worth. I found the course to  
10 be effective and full of valuable information. I thought it was done well, very professional, with  
11 much more information than could be absorbed in that short period of time. That is why there was a  
12 real need for more specialized training and mentorships later. Based on my many conversations  
13 with President Michael Sexton and other mentors and instructors, and my own personal attendance  
14 at a Trump University program, the techniques I taught in my mentorship were the same that Trump  
15 University taught in the classroom.

16 16. I am a firm believer in mentorships. I purchased a mentorship when I started my  
17 business, and I would not do it any other way. One of the things I always tried to teach in the Trump  
18 University mentorships was for the student to take the initiative and have confidence in doing the  
19 deals. After all, it's their own business. They must "take the steering wheel and drive the car."  
20 Neither a mentor nor anyone at Trump University can do the business for the student. The student is  
21 the entrepreneur with a business to build, so absolutely, they must take control.

22 17. No one at Trump University ever limited the number of hours that I was supposed to  
23 spend with each student or mentee. In fact, a typical mentorship consisted of spending four to six  
24 hours with the student on the telephone prior to meeting them in the field. Once "in the field," we  
25 worked eight to ten, maybe even 12 hour days in some cases for three consecutive days. Then, I had  
26 follow-up calls for weeks, months, and sometimes years after the in-field work. I would estimate  
27 that I averaged 30-40 hours with each student.

28



**DEx. 34**

**Lodged Under Seal**



1  
2 IN THE UNITED STATES DISTRICT COURT FOR THE  
3 FOR THE SOUTHERN DISTRICT OF CALIFORNIA  
4

5 TARLA MAKAEFF, BRANDON KELLER,  
6 ED OBERKROM, and PATRICIA MURPHY,  
7 on behalf of Themselves and All  
8 Others Similarly Situated,  
9

10 Plaintiffs,

11 Vs.

No. 10 CV 0940 CAB

12 TRUMP UNIVERSITY, LLC, (aka Trump (WVG)  
13 Entrepreneur Initiative) a New  
14 York Limited Liability Company,  
15 DONALD J. TRUMP, and DOES 1  
16 through 50, inclusive,  
17 Defendants.  
18

19 ~~~~~

20 \*\*\*CONFIDENTIAL\*\*\*

21 VIDEOTAPED DEPOSITION OF TARLA MAKAEFF

22 VOLUME IV

23 El Segundo, California

24 Monday, February 10, 2014  
25

Reported By:

Jeanese Johnson, CSR No. 11635, CLR

Job 70664

1 Geller, Rudman & Dowd for Plaintiff Makaeff.

2 MS. MARTIN: Jill Martin for  
3 defendant and counter-claimant.

4 THE VIDEOGRAPHER: Thank you.

5 Will the court reporter please swear  
6 the witness.

7 THE COURT REPORTER: Please raise  
8 your right hand.

9 Do you solemnly state the testimony  
10 you will give during this deposition proceeding  
11 will be the truth, the whole truth, and nothing  
12 but the truth?

13 THE WITNESS: Yes, I do.

14 THE COURT REPORTER: Thank you.

15

16

17 EXAMINATION BY

18 MS. MARTIN:

19 Q. Good morning, Ms. Makaeff.

20 A. Good morning.

21 Q. Have you taken any drugs not  
22 prescribed to you in the last 24 hours?

23 A. No, I have not.

24 Q. Were you taking any drugs not  
25 prescribed to you at the time of your previous

1 agencies. I had to write to Citibank. And  
2 nobody was listening to me, so I needed some help  
3 in the amount of volume of work that I was doing  
4 in help researching legal code.

5 Q. Did you do research of legal code  
6 before writing the letter to Bank of America?

7 A. Yes, it was simultaneously to writing  
8 this letter.

9 Q. And was it your understanding that  
10 Walter was also doing legal research?

11 A. Yes.

12 Q. When was the last time you spoke with  
13 Walter Grieves?

14 A. It's been several years.

15 Q. Can you give me an approximate year  
16 when the last time was you spoke with him?

17 A. Probably it's either 2010, 2011.  
18 Definitely not within the last couple years.

19 Q. Do you know where Walter Grieves  
20 currently lives?

21 A. I know he lives in Venice,  
22 California.

23 Q. Do you know his address?

24 A. No, I don't.

25 Q. Do you know his current phone number?

1           A. How would I call the police about  
2 something that involves government entities that  
3 you're usually supposed to the DA? I didn't call  
4 the police. I went to the district general and  
5 to the attorney general to complain. That's a  
6 version of police, a higher version.

7           Q. At the time you wrote your letter,  
8 you knew that Trump University did not commit the  
9 crime of grand larceny; correct?

10           MS. ECK: Objection. Assumes facts  
11 not in evidence. Misstates the witness's  
12 testimony.

13           THE WITNESS: No. I believed that  
14 they did commit that crime.

15 BY MS. MARTIN:

16           Q. Did you do any legal research about  
17 the terms "grand larceny"?

18           A. I'm not sure if it's in the legal  
19 code. I would have to look.

20           Q. Did you do any research about the  
21 terms "grand larceny"?

22           A. I just answered your question.

23           Q. You told me you're not sure if it's  
24 in the legal code. That's not answering my  
25 question.

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1 Q. Tarla, let me just -- let me just cut  
2 you off. If you'll just answer my questions this  
3 will move a lot faster.

4 A. But it's not --

5 Q. Did you think they stole your identity  
6 by open a credit card for you?

7 A. Yes, I did. I did.

8 Q. And when you thought they stole your  
9 identity, did you -- what did you do?

10 A. I don't know what you mean.

11 Q. Well, if I thought my identity was  
12 stolen, I would do something, so what did you do?

13 A. Well, here's the thing. When I was  
14 involved in a lot of this I didn't understand  
15 what I was doing until after the fact. I was  
16 brainwashed by a lot of this nonsense so I didn't  
17 do anything at the time. I thought these people  
18 were there to help me. I thought they were --  
19 they're all -- their reverse psychology, am I  
20 good enough for their program, they were duping  
21 me. None of this even occurred to me that they  
22 didn't have my greater benefit in mind.

23 So -- so I didn't do anything  
24 initially for a long time until the DA sent me a  
25 letter on June 18, 2009, and I realized the

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1 gravity of all this stuff and I started putting  
2 pieces together and realized what had happened to  
3 me. When you're in the midst of something and in  
4 the midst of being duped you don't always realize  
5 that you're being duped.

6 Q. Okay. Did you realize when were you  
7 on the phone with HSBC that they had used your  
8 financial information to open a credit card?

9 A. I didn't know what happening. All I  
10 knew is that one minute I didn't have a credit  
11 card, the next minute I did, and they told me not  
12 to worry about the payment. That's all I knew  
13 that was happening. I had just been worn down  
14 for three hours by highly manipulative and  
15 persuasive people that brainwash you. I mean,  
16 there's no other way for me to put it.

17 Q. And it's your belief that Trump  
18 University stole your identity; correct?

19 A. I said Trump University Coaching.

20 Q. So Trump University, you acknowledge  
21 that Trump University did not steal your  
22 identity?

23 MS. ECK: Objection. Misstates the  
24 witness's testimony.

25 THE WITNESS: In this particular

Confidential

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1 felt like I had a good grasp on the terms, and I  
2 didn't think it would make sense to incur an  
3 additional amount to speak with him when I  
4 thought I had already -- I felt like I had looked  
5 up legal code and what I was saying was correct  
6 to my knowledge.

7 These were private letters to the  
8 banks. They weren't posted anywhere. It's  
9 between me and the bank, and it was explaining to  
10 them what happened because in order for them to  
11 listen, I had to un -- relay to them the  
12 seriousness of the matter.

13 Q. So you felt you needed to accuse  
14 Trump University of felonies in order to convey  
15 the seriousness of the matter; correct?

16 A. No.

17 MS. ECK: Objection. Misstates the  
18 witness's testimony. Assumes facts not in  
19 evidence.

20 Go ahead.

21 THE WITNESS: No, I didn't feel I had  
22 to accuse them of crimes in order to get heard.  
23 I accused them of those crimes because they  
24 committed them.

25 ///

C E R T I F I C A T E

STATE OF CALIFORNIA )  
 ) ss.:  
COUNTY OF LOS ANGELES )

I, JEANESE JOHNSON, a Certified Shorthand Reporter, within and for the State of California, do hereby certify:

That TARLA MAKAEFF, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 21st day of February, 2014.

\_\_\_\_\_  
JEANESE JOHNSON, CSR No. 11635  
Certified LiveNote Reporter



**DEx. 36**

**Lodged Under Seal**



Location of Event: Miami, FL

1. Please rate this seminar on the following criteria:

	←—————→				Excellent
	Unsatisfactory				
Quality of the presentation	1	2	3	4	(5)
Relevance of the topics covered	1	2	3	4	(5)
Usefulness of the information	1	2	3	4	(5)
Quality of the instructor	1	2	3	4	(5)

2. What did you like the most about the seminar?  
 Tricks, advise that the average investor is not aware of.  
Opportunity to network w/ others that have the same  
 or similar interests

3. What would you suggest we improve about the seminar?  
 More often!

4. What topics would you like to see covered in future Trump University seminars?

5. Would you attend another Trump University seminar?  Yes  No

6. Would you recommend Trump University seminars to a friend?  Yes  No

7. How could Trump University help you to meet your goals?  
 One-on-One

8. Would you like a Trump University representative contact you regarding upcoming programs and special events?  Yes  No

If Yes: Henry Dominguez  
 Name  
HenryDominguez11@hotmail.com 954-547-7418  
 Email Phone  
HenryDominguez11@hotmail.com

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TU 26156



**TRUMP**  
UNIVERSITY

**Trump Profit Lab**

Training Date: April 9-11, 2010 Training Location: Philadelphia, PA

Speaker: Billy Cannon

Team: Michael Hinson, Erica May, April Neumann

Name (optional): Robert Morgensern  
 Email (optional): twleek35@gmail.com  
 Phone: 609 330 7467

My Real Estate experience:  Beginner  Intermediate  Expert

Please rate this training on the following criteria:

	Unsatisfactory	←—————→				Excellent
Quality of the presentation	1	2	3	4	5	
Relevance of the topics covered	1	2	3	4	5	
Usefulness of the information	1	2	3	4	5	
Billy Cannon exceeded my expectations as a subject matter expert who presented the material clearly	1	2	3	4	5	
Michael Hinson was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	5	
Erica May was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	5	
April Neumann was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	5	

*-Please turn over and complete reverse side-*

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1. Why did you come to this event? Interested in becoming an investor.

2. Did you learn what you expected at this event? Please elaborate. MUCH MORE THAN I EXPECTED, I WAS EXPECTING A 2 DAY LONG COURSE SELLING AND UP SELLING. I WAS PRESENTLY SURPRISED.

3. What did you like best about this event? FRIENDLY; NETWORKING, AND ALL THE INFORMATION.

4. Please provide any suggestions for how we can further improve this event. \_\_\_\_\_

5. Would you attend another Trump Profit Lab?  YES  NO

6. Would you recommend the Trump Profit Lab to a friend?  YES  NO

7. Which topic are you most interested in seeing Trump University cover? (Choose only one)

How to Make Money on the Internet

Entrepreneurship

Tax Liens

8. What is your preferred learning environment?

One-on-One

Bus Tours

Small Group

Classroom

Robert Morgan  
Signature

CONFIDENTIAL

# The TRUMP Entrepreneur Initiative

## TRUMP ENTREPRENEUR EXPO

Training Date: July 10-11, 2010 Training Location: Atlanta, GA  
 Master of Ceremonies: Fred Rewey  
 Instructors: Keith Sperry / Adam Ginsberg / Saen Higgins / Scott Schilling  
 Team: Ryan Lotman, Noah Harris, Justin Smith, Page Sadlier, April Neumann

Name (optional): Devon Acosta

Email (optional): acostalot89@msn.com

Phone: 401-588-0611

My Real Estate experience:  Beginner  Intermediate  Expert

	Unsatisfactory	←—————→			Excellent
	1	2	3	4	
Quality of the presentation	1	2	3	4	3
Relevance of the topics covered	1	2	3	4	3
Usefulness of the information	1	2	3	4	3
FRED REWEY exceeded my expectations as a subject matter expert who presented the material clearly	1	2	3	4	3
KEITH SPERRY exceeded my expectations as a subject matter expert who presented the material clearly	1	2	3	4	3
ADAM GINSBERG exceeded my expectations as a subject matter expert who presented the material clearly	1	2	3	4	3
SAEN HIGGINS exceeded my expectations as a subject matter expert who presented the material clearly	1	2	3	4	3
SCOTT SCHILLING exceeded my expectations as a subject matter expert who presented the material clearly	1	2	3	4	3
RYAN LOTMAN was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	3
NOAH HARRIS was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	3
JUSTIN SMITH was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	3
PAGE SADLIER was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	3
APRIL NEUMANN was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	3

CONFIDENTIAL

TU 47531

1. Why did you come to this event? To have a brighter future, earn more money and a better life style for me and my friends.

2. Did you learn what you expected at this event? Please elaborate. Yes because it broke down the strategies that equals big and fast income in simple easy to follow steps. You just have to have the desire to make it.

3. What did you like best about this event? Networking, the products, and the very helpful and informational staff.

4. Please provide any suggestions for how we can further improve this event. Give more than one prize to give away

5. Would you attend another Trump Expo?  YES  NO

6. Would you recommend the Trump Expo to a friend?  YES  NO

7. Which topic are you most interested in seeing Trump Entrepreneur Initiative cover? (Choose only one)

How to Make Money on the Internet

Entrepreneurship

Tax Liens

8. What is your preferred learning environment?

One-on-One

Bus Tours

Small Group

Classroom



Signature

CONFIDENTIAL

TU 47532



**TRUMP**  
UNIVERSITY

**Trump Profit Lab**

Training Date: April 30-May 2, 2010 Training Location: New York, NY

Speaker: Billy Cannon

Team: Michael Hinson Ryan Lotman, Gillian Birnie, April Neumann

Name (optional): Michael SAAFIR

Email (optional): MSAAFIR@dbs.state.ny

Phone: \_\_\_\_\_

My Real Estate experience:  Beginner  Intermediate  Expert

Please rate this training on the following criteria:

	Unsatisfactory	←—————→				Excellent
Quality of the presentation	1	2	3	4	5	
Relevance of the topics covered	1	2	3	4	5	
Usefulness of the information	1	2	3	4	5	
Billy Cannon exceeded my expectations as a subject matter expert who presented the material clearly	1	2	3	4	5 ↑	
Michael Hinson was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	5	
Ryan Lotman was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	5	
Gillian Birnie was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	5	
April Neumann was friendly, professional, approachable, and helped me answer my questions.	1	2	3	4	5	

*CERP was excellent*

*-Please turn over and complete reverse side-*  
CONFIDENTIAL

TU 45757

1. Why did you come to this event? Foreclosure buying  
in family - want to  
buy house out & save

2. Did you learn what you expected at this event? Please elaborate. yes - info & networking

3. What did you like best about this event? Alban - WEC - Albany

Nice event - great location!!!  
great for watch presentation!!!  
4. Please provide any suggestions for how we can further improve this event.

5. Would you attend another Trump Profit Lab?  YES  NO

6. Would you recommend the Trump Profit Lab to a friend?  YES  NO

7. Which topic are you most interested in seeing Trump University cover? (Choose only one)

How to Make Money on the Internet - 2

Entrepreneurship

Tax Liens ← 1

8. What is your preferred learning environment?

One-on-One + 1

Bus Tours - 2 B

Small Group

Classroom + 2 A

Michael Lopez  
Signature

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TU 45758